

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
STEPHEN GRAY, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
SHAUN ROSE, Individually and On	:
Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 10,	:
	:
Defendants.	:
-----X	
MEREDITH TRANBERG, individually	:
and on behalf of all others similarly situated :	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 9790 (SHS)

Civil Action No: 07 Civ. 10294 (DC)

Civil Action No: 07 Civ. 10341 (UA)

-----X  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :  
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 :  
Plaintiff, : Civil Action No: 07 Civ. 10396 (UA)  
v. :  
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 :  
CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :  
 :  
 :  
Defendants. :  
-----X

SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :  
 :  
 :  
Plaintiff, : Civil Action No: 07 Civ. 10442 (UA)  
v. :  
 :  
 :  
CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :  
 :  
 :  
Defendants. :  
-----X

-----X  
STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 10458 (UA)  
v. :  
:  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:  
Defendants. :  
-----X

JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 10461 (UA)  
v. :  
:  
CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:  
Defendants. :  
-----X

-----X  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472 (UA)

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-----X  
ALAN STEVENS, on Behalf of Himself :  
and All Others Similarly Situated, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 11156 (UA)  
v. :  
:  
CITIGROUP INC., CITIBANK, N.A, :  
CHARLES PRINCE, C. MICHAEL :  
ARMSTRONG, ALAIN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, PETER JOHNSON, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANDREW N. LIVERIS, ANNE :  
MULCAHEY, RICHARD D. PARSONS, :  
JUDITH RODIN, ROBERT E. RUBIN, :  
ROBERT L. RYAN, FRANKLIN A. :  
THOMAS, THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., THE INVESTMENT :  
COMMITTEE and JOHN DOES 1-30, :  
:  
Defendants. :

-----X  
STEPHEN GOLDSTEIN, on Behalf of :  
Himself and a Class of Persons Similarly :  
Situated, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 11158 (UA)  
v. :  
:  
CITIGROUP INC., THE PLANS :  
ADMINISTRATION COMMITTEE OF :  
CITIGROUP, INC., MICHAEL E. :  
SCHLEIN, CHARLES PRINCE, C. :  
MICHAEL ARMSTRONG, ALAIN J.P. :  
BELDA, GEORGE DAVID, KENNETH T. :  
DERR, JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANNE MULCAHEY, :  
RICHARD D. PARSONS, JUDITH :  
RODIN, ROBERT E. RUBIN, ROBERT L. :  
RYAN, AND FRANKLIN A. THOMAS, :  
And JOHN DOES 1-30, :  
:  
Defendants. :

-----X	
CHRIS SOUTHARD, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:
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FRANCIA BRICK, individually and on	:
Behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLAN'S ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP, INC.,	:
THE 401(k) INVESTMENT COMMITTEE,	:
And JOHN DOES 1-10,	:
	:
Defendants.	:
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Civil Action No: 07 Civ. 11164 (UA)

Civil Action No: 07 Civ. 11369 (UA)

**DECLARATION OF ROBERT A. IZARD**

I, Robert A. Izard, declare as follows:

1. I am a Shareholder in the law firm Schatz Nobel Izard, P.C.
2. Attached hereto as Exhibit A is a true and correct copy of a Special Master's Report and Recommendation issued in *In re AOL Time Warner, Inc. Sec. and ERISA Litig.*, No. 02-1500 (S.D.N.Y), dated August 7, 2007.
3. Attached hereto as Exhibit B is a true and correct copy of an Order issued in *In re AOL Time Warner, Inc. Sec. and ERISA Litig.*, No. 02-1500 (S.D.N.Y), dated October 26, 2007.
4. Attached hereto as Exhibit C is a true and correct copy of a transcript of proceedings in *In re Merck Sec., ERISA and Deriv. Litig.*, No. 05-1157 (D.N.J.), on April 18, 2005.
5. Attached hereto as Exhibit D is a true and correct copy of a Case Management Order issued in *In re Tyco International, Ltd. Sec. Litig.*, Case No. 02-1335 (D.N.H.), on December 20, 2002.
6. Attached hereto as Exhibit E is a true and correct copy of an Order issued in *In re Sprint Corp. ERISA Litig.*, No. 03-2202 (D. Kan.), issued on August 3, 2006.
7. Attached hereto as Exhibit F is the firm resume of Schatz Nobel Izard, P.C.
8. Attached hereto as Exhibit G is a true and correct copy of a Citigroup 401(k) Plan Summary Plan Description.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of December, 2007.

/s/  
\_\_\_\_\_  
Robert A. Izard